

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

VERONICA KARIUKI)	
)	
Plaintiff,)	
)	Civil Case No.: 1:15-cv-00934-TSE-JFA
v.)	
)	
ETeAM, INC.)	
)	
)	
Defendant.)	
_____)	

PLAINTIFF VERONICA KARIUKI'S INITIAL DISCLOSURES

Plaintiff Veronica Kariuki (hereinafter "Plaintiff"), by counsel, General Counsel, P.C., and pursuant to Federal Rules of Civil Procedure Rule 26(a)(1) and the Scheduling Order, serves the following initial disclosures:

Pursuant to Federal Rules of Civil Procedure Rule 26(a)(1)(A)(i):

(1) Kumar Nagdev

- a. Address: 2010 Corporate Ridge, Suite #700, McLean, Virginia 22102 (eTeam, Inc.'s Virginia office).
- b. Telephone No.: (732) 248-1900 (eTeam, Inc.'s corporate headquarters).
- c. Subject of discoverable information: Kumar Nagdev has knowledge regarding sending the e-mail in his capacity as a recruiter for Defendant eTeam, Inc. to Plaintiff Veronica Kariuki. He has knowledge about the e-mail stating: "Hi Veronica, Thanks for the email, But however we are looking for Male Candidate as this is an Field Job." Kumar Nagdev also has knowledge regarding the Field Technician position that Plaintiff Veronica Kariuki applied for, the

applicants who applied, the rationale for selecting the individuals for an interview for the position, background information regarding the individuals who were selected for an interview for the position, and the individual(s) who was ultimately hired for the position.

Pursuant to Federal Rules of Civil Procedure Rule 26(a)(1)(A)(ii):

(1) Attached onto this initial disclosure as Exhibit A is a copy of the August 5, 2013 e-mail from Kumar Nagdev to Veronica Kariuki stating: "Hi Veronica, Thanks for the email, But however we are looking for Male Candidate as this is an Field Job."

(2) Attached onto this initial disclosure as Exhibit B is a copy of the August 5, 2013 e-mail from Kumar Nagdev to Veronica Kariuki with metadata.

(3) Attached onto this initial disclosure as Exhibit C is a copy of the resume Veronica Kariuki submitted to Defendant eTeam, Inc. for the Field Technician position.

Pursuant to Federal Rules of Civil Procedure Rule 26(a)(1)(A)(iii):

(1) \$75,000 in back pay;

(2) \$75,000 in front pay;

(3) \$30,000 in lost benefits;

(4) \$20,000 in interest; and

(5) \$100,000 in medical bills.

In addition, Plaintiff Veronica Kariuki's attorneys' fees and court costs for filing her claim against Defendant eTeam, Inc.

Respectfully submitted,

/s/ J. Andrew Baxter

J. Andrew Baxter (VSB #78275)

Merritt J. Green (VSB #50995)

Connie M. Ng (VSB #85910)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2015, the foregoing Plaintiff's Rule 26(a)(1) Initial Disclosures was served via U.S. mail, postage prepaid to the following:

CARL MALONEY P.C.
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Washington, D.C. 20036

/s/ J. Andrew Baxter
J. Andrew Baxter (VSB #78275)
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